

DANIEL MARCUS, ESQ.

(551)-427-5069
dan@hlgesq.com

BY ECF

July 10, 2025

The Honorable Gary Stein
United States Magistrate Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

MEMO ENDORSED

Re: Hazan Sports Management Group, Inc. v. Beasley/ 1:25-cv-03259-JAV-GS

Dear Judge Stein,

I represent the Plaintiff, Hazan Sports Management Group, Inc., in the above captioned case. I hereby submit this letter motion for an additional extension of time to move for a default judgment, as since our original letter motion dated June 11, the Defendant's employment prospects as a professional basketball player in the NBA have materially changed in the wake of reports of an active federal criminal investigation of the Defendant's alleged sports wagering activities. These reports have impacted negotiations as they have created a great deal of uncertainty regarding Plaintiff's best path to recovery of the amounts owed to them by Defendant.

The Plaintiff has been in contact with the relevant stakeholders within the world of professional basketball and the NBA about the matter in order to obtain greater clarity about the Defendant's standing with the NBA and his likelihood of obtaining employment with an NBA club for the upcoming season which begins in October. It is Plaintiff's belief that they will receive sufficient clarity within the coming weeks to understand whether a settlement is advisable in light of the unforeseen change in circumstances.

Therefore, in the interest of judicial efficiency and providing the Plaintiff sufficient time to obtain all of the relevant facts as to how to proceed with this case, pursuant to Local Civil Rule 7.1(d), the Plaintiff hereby requests an additional extension of thirty (30) days to either file its motion for default judgment or provide the court with a further update regarding the progress (or lack thereof) of settlement negotiations.

Respectfully Submitted,



Daniel Marcus, Esq.

Application granted. Plaintiff's deadline to move for a default judgment is extended to August 11, 2025. If Plaintiff believes a further extension is necessary to facilitate settlement discussions, it shall file a request for an extension prior to that date demonstrating good cause therefor.

Date: July 15, 2025
New York, NY

SO ORDERED:



HON. GARY STEIN
UNITED STATES MAGISTRATE JUDGE

